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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CARRIE COUSER , Individually, And) On Behalf Of All Others Similarly) Situating,) Plaintiff,) v.) ARS AMERICAN RESIDENTIAL) SERVICES OF CALIFORNIA dba) RIGHTIME HOME SERVICES,) Defendant.)	Case No. 5:15-cv-01739-PA-SP JOINT STIPULATION OF DISMISSAL OF ACTION WITH PREJUDICE AS TO THE NAMED PLAINTIFF AND WITHOUT PREJUDICE AS TO THE PUTATIVE CLASS
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NOW COME THE PARTIES by and through their attorneys to respectfully move this Honorable Court to dismiss this matter with prejudice as to the named Plaintiff, and without prejudice as to the Putative Class alleged in the complaint, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Each party shall bear their own costs and attorney fees. A proposed order has been concurrently submitted to this Court.

1 The notice and approval requirements of Federal Rule of Civil Procedure
2 23(e) are inapplicable to the parties' settlement and dismissal of this putative
3 class action because this action has not been certified as a class.¹

4 The Parties agree that this Court can proceed to dismiss this Action entirely
5 with prejudice as to the Named Plaintiff and without prejudice as to the Putative
6 Class alleged in the complaint.

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8 Respectfully submitted this 14th day of March, 2016

9 By: s/Todd M. Friedman, Esq.
10 TODD M. FRIEDMAN
11 Attorney for Plaintiffs

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13 By: s/Erin R Ranahan, Esq.
14 ERIN R. RANAHAN
15 Attorneys for Defendant

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¹ Federal Rule of Civil Procedure 23(e) states "[t]he claims, issues or defenses of a certified class may be settled, voluntarily dismissed, or compromised only with the Court's approval.

1 Filed electronically on this 14th day of March, 2016, with:

2 United States District Court CM/ECF system

3 Notification sent electronically via the Court's ECF system to:

4
5 Honorable Percy Anderson
6 United States District Court
7 Central District of California

8 Erin R Ranahan
9 Winston and Strawn LLP

10 Drew Ann Robertson
11 Winston and Strawn LLP

12 Kelly Nicole Oki
13 Winston and Strawn LLP

14 Neal R Marder
15 Winston and Strawn LLP

16 This 14th day of March, 2016

17 s/Todd M. Friedman, Esq.
18 TODD M. FRIEDMAN
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